#### **CITY OF SEATTLE**

## ANALYSIS AND DECISION OF THE DIRECTOR OF THE DEPARTMENT OF PLANNING AND DEVELOPMENT

SEPA Threshold Determination for the Comprehensive Plan Periodic Review and Update, 2014/2015 Annual Amendments and Amendment to SMC 23.52.004

**Project Sponsor**: City of Seattle Department of Planning and Development (DPD)

**Location of Proposal:** The amendments relate to the City's Comprehensive Plan, which

pertains to the entire City.

#### **BACKGROUND**

#### Seattle's Comprehensive Plan

The City first adopted the Comprehensive Plan in 1994 and conducted a review and update of the Plan in 2004, extending the Plan's horizon to 2024 and planning for revised growth estimates. Various aspects of growth are to be governed by policies in Plan chapters (called "Elements") addressing land use, transportation, housing, capital facilities, utilities, and (for Seattle and Tacoma) container ports. Seattle has also elected to include elements related to urban villages, economic development, neighborhood planning, human development, cultural resources and the environment.

#### **Annual Amendment Process**

The City has amended the Plan in most years since it was first adopted. The City follows a process each year for individuals, groups, and City departments to propose updates to address changing conditions so the plan will reflect new policy direction or new information. The Council then follows a two-step process. In the first step, the Council decides which of the suggested amendments should be examined further and adopts a resolution directing the Seattle Department of Planning and Development (DPD) to analyze those. After DPD completes its analysis, it works with the Mayor to prepare recommendations regarding amendments for the Council to consider. The Council reviews the Mayor's recommendations, holds a public hearing and adopts an ordinance amending the Plan.

In 2014, the Council received several suggestions for amending the Plan and adopted Resolution 31536 to identify particular suggestions for analysis and recommendation in this year's annual amendment cycle. The recommended ordinance would amend the Plan to incorporate some of those amendments.

#### Required Periodic Review and Update of Plan

The GMA requires that Seattle and other cities in King County review and if necessary update their comprehensive plans this year ("periodic review" or "periodic update"). The City has elected to combine the annual amendment process with the periodic review and an update of selected portions of the Comprehensive Plan, as described below (hereinafter "Periodic

Update"). The Executive's review of the current plan did not identify a need to modify significant portions of the policy direction contained in the Plan. Instead, the review emphasized updating specific sets of data and inventories, based on the expected population and employment growth anticipated in the city over the next 20 years.

Note: there is a separate but concurrent legislative proposal that contains other comprehensive plan amendments generally related to affordable housing. An additional separate proposal may also be considered in 2015 that contains other Comprehensive Plan amendments -- generally related to neighborhood-specific policies in the University District -- which have been evaluated in the University District Urban Design EIS. These two other separate comprehensive plan amendments are not necessary as part of the periodic update under the Growth Management Act but may be adopted in 2015 concurrently with the amendments recommend in this Director's Report.

#### **DESCRIPTION OF PROPOSAL**

The proposal consists of a variety of possible amendments to the Comprehensive Plan, as summarized below. A full list of amendments is in the Ordinance and described in the Director's Report. The proposed amendments will be considered by the City Council in 2015.

## A. Adoption of a package of Comprehensive Plan Amendments as part of the Periodic Update.

DPD recommends the following amendments to update the Comp Plan to accept the growth estimates for the 2015-2035 planning horizon.

- 1. Updating the Comprehensive Plan to accept new growth estimates of 70,000 additional housing units and 115,000 additional jobs. This is the City's share of the region's projected housing and employment growth between 2015 and 2035, identified through the countywide process conducted by the Growth Management Planning Council.
  - a. Growth amounts proposed to be assigned for Seattle at the citywide level represent the city's share of King County's projected 20-year population and employment growth. The City plans its zoning and infrastructure to accommodate these targets.
  - b. A recommendation to update growth assumptions for the City's urban centers and manufacturing/industrial centers. Urban centers are the largest type of places designated for growth, including Downtown, Capitol Hill/First Hill, South Lake Union, Uptown Queen Anne, University District and Northgate, and they are recognized in the regional growth management strategy.
    - i. Revisions to "Urban Village Figure 8" are included to further the City's urban village strategy;
    - ii. Other text edits that are made to policies that currently refer to growth targets or to Urban Village Figure 8 or Urban Village Appendix A.
  - c. Revisions to the Housing Element include:

- i. Amending Goal HG1 and deleting Housing Policy H30 to acknowledge the 70,000 dwelling unit growth estimate and to reflect the revised approach in the 2012 King County Countywide Planning Policies (KC CPPs) for determining the share of the need for affordable housing the City will accommodate.
- d. The economic development policy EDG1 is updated to reflect the new population projection and planning horizon.
- 2. Updated Comprehensive Plan appendices for transportation, capital facilities, housing, utilities, economic development and land use.
  - The Housing Appendix is amended to include updated analysis and inventory beyond the current plan including updated characteristics of housing stock, populations and housing need, as required by the KC CPPs.
  - The Transportation Appendix is amended to removed outdated references. The existing volume and capacity data and the transportation expenditure and revenue figures are updated.
  - The Urban Village Appendix A and the Economic Development Appendices are removed because the information contained therein is outdated.
  - The Utilities, Capital Facilities, and Land Use Appendices are updated to reflect the new population and employment projections and relevant changes to inventory or capacity.

The recommendations leave intact the City's approach of accommodating citywide growth by continuing to use the urban village strategy. This has been the City's prevailing growth management strategy and primary urban planning principle for the past twenty years and the strategy continues to be maintained as part of the Periodic Update. As this does not represent a change in policy direction, it is not included as part of the actions evaluated in this proposal, but is noted as supporting information that reflects on the City's overall intention as to specific aspects of the action being considered.

# B. Amendment to neighborhood-specific policies in the Neighborhood Planning Element and amendments to the Future Land Use Map (FLUM) in the 23<sup>rd</sup>-Union/Jackson Residential Urban Village:

This set of proposed amendments arises from neighborhood planning efforts conducted by DPD with community stakeholders that are intended to shape future development patterns and characteristics. The FLUM changes would affect limited portions of the neighborhood, including two places just west of 23<sup>rd</sup> Avenue along E. Cherry Street and along E. Union Street. The proposal includes the following:

- 1. Add policy language to the Central Area portion of the Neighborhood Planning Element to accommodate the possibility of redesignating certain land from 'single-family' to a 'commercial/mixed use' designation.
- 2. Recommended FLUM amendments will:

- a. Re-designate a small area on the north edge of E. Cherry Street from Single Family to Commercial/Mixed Use.
- b. Re-designate another area from Multi-Family Residential to Commercial/Mixed Use. This area is located on the south side of E. Cherry Street, just west of properties along 23<sup>rd</sup> Avenue.
- c. Expand the Urban Village boundary for the 23<sup>rd</sup>-Union/Jackson residential urban village to include an area west of 23<sup>rd</sup> Avenue and near E. Union Street. No change to the FLUM designation is proposed for these Commercial/Mixed Use parcels.

# C. Amendment to neighborhood-specific policies in the Neighborhood Planning Element and amendments to the Future Land Use Map in the Morgan Junction Residential Urban Village:

This would affect property owned by the West Seattle Church of the Nazarene, in the Morgan Junction Residential Urban Village, located at 42<sup>nd</sup> Avenue SW and SW Juneau Street. The proposal addresses the following:

- 1. Modifications to language in Policies MJ-P6 and MJ-P13 would allow for very limited circumstances in which an area designated Single-Family could be redesignated, allowing for a rezone to something other than Single-Family.
- 2. Update the FLUM by:
  - a. Re-designating less than one acre of land, currently occupied by a church and an associated residence, from Single Family to Multi-Family Residential on the west side of 42<sup>nd</sup> Avenue SW, in the northern portion of the Morgan Junction Residential Urban Village.
- D. Amendment to neighborhood-specific policies in the Neighborhood Planning Element and amendments to the Future Land Use Map in the Lake City Hub Urban Village: This set of recommended map changes arises from neighborhood planning efforts by DPD with community stakeholders, meant to encourage more pedestrian-friendly development, with the potential for future improvements in urban design. This would affect an area near

NE 125<sup>th</sup> Street and 26<sup>th</sup>, 27<sup>th</sup> and 28th Avenues NE, the Lake City Library and Virgil Flaim Park. The recommendation would:

- 1. Revise policy language in the Lake City portion of the Neighborhood Planning Element to allow increased height, bulk or density in and around the neighborhood's civic core in limited circumstances.
- 2. Update the FLUM by:
  - a. Re-designating approximately 5 acres from Multi-Family Residential to Commercial/Mixed Use in the vicinity of NE 125<sup>th</sup> Street near 27<sup>th</sup> Avenue NE.

- E. Amendments to Policies Addressing Environmentally Critical Areas: In 2014, the City updated its report on the best available science related to ECAs. Recommended amendments to these policies reflect new information in that report, as well as language changes to improve the clarity of existing policies. The amendments include recognition of peat settlements as a classification of ECA.
- F. Amendments to Environment Element Policies Addressing Stormwater Drainage Management and Permeable Surfaces: Proposed revisions to the wording of Policies EP8.1 and EP10 would include more specific descriptions of intended purposes and targeted design components for EP8.1, including reference to low-impact development techniques, and broaden the language of EP10 to include a focus on removing unnecessary impervious surfaces.
- G. SMC 23.52.004 (Requirement to meet transportation level of service (LOS) standards) is amended to delete out-of-date information, update the screenline location maps and recognize that the LOS volume to capacity methodology is in an associated Director's Rule.

#### **ANALYSIS - OVERVIEW**

The following describes the analysis conducted to determine if the proposal is likely to have a probable significant adverse environmental impact. This threshold determination is based on:

- the proposal, as described above;
- the information contained or referenced in the SEPA checklist;
- additional information, such as analyses prepared by City staff; and
- the experience of DPD analysts in reviewing similar documents and actions.

#### **ELEMENTS OF THE ENVIRONMENT**

Adoption of the possible amendments would result in no immediate adverse short-term impacts because the adoption would be a non-project action. The discussion below generally evaluates the potential long-term adverse impacts that might conceivably result from net differences in future development patterns or other physical environmental implications due to the proposed amendments. The analysis is organized to address each item's impacts individually. This is a programmatic level analysis oriented to addressing matters pertinent to SEPA elements.

#### ITEM A – Comprehensive Plan Amendments as part of the periodic review

The proposed edits update the Comprehensive Plan to accept new 20-year growth estimates. The proposed amendments also identify portions of that growth as expected to occur within the Urban Centers and Manufacturing/Industrial Centers. These centers are recognized in regional planning efforts. The amounts of housing units and jobs allocated to the centers approximately reflect the distribution of growth that has occurred in the city over the past 20-year period, during the time when the Urban Village Strategy has been the preferred growth management organizing

principle. The current proposal reflects that the Urban Village Strategy will continue to be the preferred growth management organizing principle going forward.

While policy and text revisions are being made to respond to the current status of planning efforts, they do not amount to a change in direction away from the Urban Village Strategy that is the fundamental premise of the current Plan. Rather, the proposed revisions will primarily help to maintain internal consistency in various details, such as, for example, editing or deleting references to "growth targets" at the Urban Village level and preferred jobs/housing ratios that would be inaccurate if they remained.

The proposal also includes amendments to the Comprehensive Plan's policies related to environmentally critical areas, using the most recent best available science and adding consideration of peat settlement areas, seismic and volcanic hazard areas.

#### **BUILT ENVIRONMENT**

#### Land Use, Height/Bulk/Scale, Housing

The City's proposal acknowledges a commitment to plan for growth by adopting growth estimates of 70,000 additional housing units and 115,000 additional jobs over 20 years. The City is obligated through agreement with its regional government partners, and goals central to the Comprehensive Plan such as UVG3 which provides: "Implement regional growth management strategies and the countywide centers concept through this Plan." The projections are derived from economic forecasts and follow-up discussion and evaluation by the Growth Management Planning Council (GMPC). The amounts of growth that Seattle accepts are established in the Countywide Planning Policies developed by the GMPC.

The proposed growth estimates for the Urban Centers are as follows:

Urban Center	Housing Units	Jobs
Downtown	10,000	30,000
First Hill/Capitol Hill	7,000	4,000
South Lake Union	4,700	20,000
Uptown	3,500	3,500
University District	2,700	8,000
Northgate	1,600	5,000
Greater Duwamish Manuf./Industrial Center	N/A	3,000
BINMIC	N/A	1,500

The total growth amounts of 70,000 additional housing units and 115,000 additional jobs to plan for from 2015-2035 compares to 47,000 households and 84,000 additional jobs identified for the period from 2004 to 2024. In the ten-year period since 2004, the City has added nearly 43,000 housing units and also about 43,000 jobs – meaning that the pace of housing growth has been faster than the 2004 targets suggested, while employment has been closer to the expected pace. The 70,000 housing units called for in the next 20 years is just slightly higher than the 67,000 housing units added in the past 20 years.

Notwithstanding that growth can occur in ways that help to achieve regionally and locally desirable efficiencies of land use that are considered more environmentally sustainable, there are potential adverse environmental impacts of more residential and job growth. Adverse impacts, typically interpreted as spillover effects or negative externalities, can occur such as:

- increased traffic volumes that lead to added road system congestion;
- land use relationships that have the potential to create incompatibility or contribute to adverse health effects (such as physiological effects from air or noise pollution);
- increased presence of building bulk or scale in the built environment that is interpreted as excessive; and
- increasing trends toward higher cost of housing.

The City's land use controls, area zoning, and a wide range of planning and capital improvement efforts coordinated among City departments are meant to address many of these impacts by providing improvements to the city over time, and by setting parameters for levels, and types of uses and development, that can occur throughout the city.

The impact analysis should identify substantive differences if the proposal is adopted, compared to impacts if the proposal was not adopted. In this case, the comparison between the proposal and following a "no-action" pathway does not yield any substantive differences.

- The existing zoned development capacity is well above the 70,000 additional dwelling units that the City has been allocated to accept by King County (*Development Capacity Report*, 2014, referenced in the checklist and considered as part of the threshold determination).
- Item A does not require or propose any substantive changes in land use designations, zoning or regulations in order to implement it.
- DPD proposes to continue to follow the Urban Village Strategy as a primary organizing principle in its planning and management of future growth.
- The recommended Urban Center growth assumptions reflect distributions of growth that are similar to the distributions observed over the past twenty years.
- The citywide growth estimates are required by state law to be adopted.
- The recommended edits to policies will help keep the Plan up to date and do not contain any identified logical inconsistencies.

With no identified substantive difference between growth patterns that would occur if the recommended amendments are adopted, compared to growth patterns that would occur under a baseline "no action" scenario (e.g., what would happen if the proposal is not adopted), a conclusion is warranted that no incremental adverse environmental impacts are likely for these elements of the environment. This conclusion also encompasses the potential for indirect and cumulative impacts.

#### Housing Element Goal HG1 and Policy H30 Edits

The amendments include proposed changes to Goal HG1 and deletion of Policy H30 to accept the 70,000 dwelling unit growth estimate for the 2015-2035 planning horizon and to reflect the revised approach in the 2012 Countywide Planning Policies for determining the share of the need for affordable housing the City will accommodate, which is necessary to establish consistency with the KC CPPs. The Housing Appendix has been amended to include updated analysis and inventory beyond the current plan including updated characteristics of housing stock, populations and housing need, as required by the KC CPPs.

These amendments provide for up-to-date consistency of the Comprehensive Plan with other City and County policies pertaining to housing. Therefore, there is essentially no potential for significant adverse land use, height/bulk/scale, or housing impacts to occur as a result of these changes.

#### **Historic Preservation**

Future development within the planning period potentially could affect older buildings through demolition activities. While some of these older buildings might be candidates for historic landmark designation, the City would continue to follow policies and procedures for reviewing landmark eligibility prior to demolition. Also, existing designated historic landmark structures would continue to be protected by current City codes. It should also be noted that because there is no identified difference between future growth under the proposal versus under a baseline "no action" scenario, no new or different potential for adverse impacts are identified for this element of the environment.

#### Noise, Shadows on Open Spaces, Light/Glare

Future development within the planning period potentially could contribute to land use patterns that would generate adverse noise impacts, light/glare impacts, and shadows on open spaces. Noise regulations would continue to apply within the city in ways that define acceptable ranges of noises for different activities and times of day. However, it should also be noted that because there is no identified difference between future growth under the proposal versus under a baseline "no action" scenario, no new or different potential for adverse impacts are identified for this element of the environment.

#### **Public View Protection**

Future development within the planning period potentially could contribute to land use patterns that would generate adverse impacts upon public views from protected locations. However, it should be noted that because there is no identified difference between future growth under the

proposal versus under a baseline "no action" scenario, no new or different potential for adverse impacts are identified for this element of the environment.

#### **Transportation, Parking**

Future development within the planning period would contribute to changes in land use patterns, such as increasing intensity of uses in places such as Urban Centers, which would add demands to the transportation network. Given the nature of the proposal, including a continued commitment to the Urban Village Strategy and growth assumptions for Urban Centers that resemble growth patterns from the past twenty years, such added demands would likely occur in a similar fashion as has happened in the last twenty years, with gradually increasing intensity of use across several areas of the city, although various areas might experience periods when growth occurs at a greater pace or a lesser pace.

Notably, four of the six Urban Centers are located adjacent to one another, clustering around Downtown, and informally known as "Center City." Given the locational qualities these areas have, and their existing denser levels of urbanization, they are already conducive to a projected higher level of transit use per capita (and/or other transportation modes such as walking and bicycling) which would likely aid in moderating overall congestion levels to avoid worst-case conditions even though increased congestion in these areas is still likely over the long term.

It should be noted that because there is no identified difference between future growth under the proposal versus under a baseline "no action" scenario, no new or different potential for adverse transportation or parking impacts are identified for this element of the environment.

Supplementary analysis for future transportation conditions in 2035 also provides some perspective about probable future levels of service that will be afforded by the transportation network available at that time. This analysis has reviewed probable outcomes under alternatives that include a "no action alternative" that has the same growth assumptions for the Urban Centers as this current proposal under review.

The analysis also includes other assumptions about how other non-center growth may occur through 2035, which similarly assume outcomes in Urban Villages and other non-Village places that are comparable to the growth patterns experienced over the past twenty years. The Comprehensive Plan defines performance of the City's transportation system using a set of "screenlines." Analysis of the recommended growth levels concludes that for all screenlines identified in the current Comprehensive Plan, including for those screenlines associated with urban villages, the pattern of future growth would maintain levels of service within the defined standards for those screenlines. The standards are a "volume-to-capacity" (v/c) ratio of 1.0 or 1.20 that measures peak hour volumes as the numerator and total street capacity as the denominator. A v/c ratio of 1.20 as a level of service standard denotes places where the City tolerates a level of congestion during peak traffic periods that technically exceeds the rated capacity for a given street or highway or set of streets. Examples of places with the 1.20 v/c

9

<sup>&</sup>lt;sup>1</sup> A screenline is an imaginary line defined across several arterials for which total street capacity is evaluated to identify relative ability to accommodate traffic volumes, especially for peak-use periods.

standard include the Ballard Bridge, Fremont Bridge, Aurora/SR 99 Bridge, the screenline covering both the University and Montlake Bridges. Places where the draft findings predict exceedances of v/c ratios of 1.0 in 2035 include: the Ballard Bridge, the screenline for access to/from West Seattle including the West Seattle Bridge and Spokane Street Bridge, the screenline for the combined University Bridge and Montlake Bridge, South Lake Union, and the north city limit screenline measuring Aurora Avenue N and other arterials west of Aurora. These are for the peak direction of travel during the peak commuting hour. However, none of these 1.0+ v/c findings would cause exceedance of standards because the relevant level of service standard for each is a v/c ratio of 1.20.

#### **Public Services, Utilities**

Future development within the planning period likely would contribute to population levels that would add demands and burdens to the provision of public services (such as police, fire, parks, schools) and utilities (such as water, sewer, electricity systems). Available analyses for capital facilities summarize conditions and an inventory of capital facilities across the city. The City has the ability and capacity to continue to serve the future patterns of citywide population and land uses with public services and utilities. This would be supported by the continued provision and operation of current facilities/services, planned future improvements to facilities/services, and localized improvements that may be required to serve future development.

However, it should also be noted that because there is no identified difference between future growth under the proposal versus under a baseline "no action" scenario, no new or different potential for adverse impacts are identified for these elements of the environment.

#### NATURAL ENVIRONMENT

#### Earth, Water (Drainage & Water Quality), Plants & Animals, Construction Impacts

Future development within the planning period potentially could contribute to land use patterns that have the potential to adversely affect natural resources including sensitive geologic features such as steep slopes, landslide areas, seismically vulnerable areas, plant/animal habitat, and natural hydrologic features such as local streams and drainage courses. This could occur directly or indirectly depending upon how well future development sites follow the City's current protective practices for minimizing disturbance of soils, critical areas, and localized drainage patterns that could contribute to downstream effects. Current City codes, policies and practices provide reasonable protections to reduce and/or minimize many impacts. Additionally, the recommendation includes new and revised policies that would extend protection to new land areas that would be classified as environmentally critical.

However, it should also be noted that because there is no identified difference between future growth under the proposal versus under a baseline "no action" scenario, no new or different potential for adverse impacts are identified for these elements of the environment.

#### Air Quality, Energy, Environmental Health

Future development within the planning period potentially could contribute to incremental and likely slight adverse impacts upon local air quality, additional consumption of energy, and

potential additional exposure to environmental health consequences to the extent that existing contaminated places might be reused without proper remediation, or proper practices are not followed with respect to preventing waterborne pollution from sources such as improperly treated surface runoff to streams and other waterbodies.

However, it should also be noted that because there is no identified difference between future growth under the proposal versus under a baseline "no action" scenario, no new or different potential for adverse impacts are identified for these elements of the environment.

## ITEM B – 23<sup>rd</sup>-Union/Jackson Land Use Designation Changes

#### NATURAL ENVIRONMENT AND BUILT ENVIRONMENT

### 23<sup>rd</sup> & Cherry

If future development occurs in greater intensity following the recommended land use action, the likely kinds of adverse natural environmental consequences would be an increased likelihood, and slightly greater potential magnitude, of disturbance of soils in a greater area, possible changes in local stormwater surface drainage patterns, creation of dust, and generation of noise. All of these construction-related impacts could temporarily disturb nearby residents. After construction, the increase in potential for natural environmental impacts due to future use and development would be minor, due to the nature of the probable uses (residential occupation, employment/business), the features incorporated into code-compliant future development, and the infrastructure that would be available to serve future development. All these would help reduce or avoid spillover effects upon the natural environment.

The 23<sup>rd</sup> and Cherry area is a community-serving node that contains mixed-use developments, an abundance of community assets including parks/open space, Garfield High School and Community Center, teen center, arts program and small businesses that draw a broad mix of people. The current uses of the affected properties are either single-family residential or vacant yard/lot in nature. They abut or lie across the street from other single-family residential uses, with non-residential uses east along 23<sup>rd</sup> Avenue, including a gas station immediately adjacent to the property on the south side of E. Cherry Street. Due to their proximity or adjacency to arterials and adjoining non-residential uses, the character of the built environment context is less homogeneous than many other typical Seattle properties located within the Single Family designation. Other residential properties in the immediate vicinity are already affected by nearby non-residential use and traffic patterns, with respect to daily activities and noise. It should be noted that the nearby single-family properties also sit topographically higher than the subject properties, affording an added degree of physical separation. In such an area, the potential for increased development nearby, which could include residential and non-residential uses, would add an increment of adverse impact potential due to increased proximity of denser development, but would not create whole new kinds of impacts upon its neighboring properties. Included would be slightly increased proximity to denser use patterns and higher-scaled buildings, the potential for added outdoor activities on the properties, the potential for increased traffic volumes

generated by the affected properties, and the potential for added noise generation on the affected properties. Future planning could propose land use controls, such as bulk and scale, and this would aid in reducing these impacts.

If future uses happen to be institutional or community-supporting uses, the potential intensity of impact could be somewhat less than what would otherwise be possible within the zoning and code requirements, although this is not certain. This would depend on whether such uses would be additive, accessory or supportive to other uses such as churches, or whether they would be new multi-use buildings that might be able to include residential as well as other uses.

All of these factors support a conclusion that the potential range of land use-related built environmental impacts would not be significant and adverse in magnitude. Also, no indirect or cumulative impacts are identified.

#### 23<sup>rd</sup> & Union

Adding a couple of limited-size block edges at E. Union Street to the urban village would not create substantial adverse impact implications, because the properties are already zoned for and predominantly used for commercial purposes. The 23<sup>rd</sup> and Union area is a main neighborhood node with larger scaled mixed use development, serving as the community's largest center for goods and services. Future infill development at comparable levels could occur whether these areas are inside of the urban village or not, meaning there is little or no change in the potential for adverse natural or built environment impacts. Also, no indirect or cumulative impacts are identified.

#### ITEM C – Morgan Junction Land Use Designation Changes

#### NATURAL ENVIRONMENT AND BUILT ENVIRONMENT

### West Seattle Church of the Nazarene - 42<sup>nd</sup> Ave SW and SW Juneau Street

If future development occurred in greater intensity following the proposed amendment to the Future Land Use Map, the likely kinds of short-term adverse natural environmental consequences would be an increased likelihood, and slightly greater potential magnitude, of disturbance of soils in a greater area, possible minor-to-minimal changes in local stormwater surface drainage patterns, and short-term creation of dust and generation of noise. All of these construction-related impacts could temporarily disturb nearby residents.

After construction, the increase in potential for natural environmental impacts due to future use and development would be minor-to-minimal, because the nature of the probable uses (residential occupation, continuation of a religious institution), the features incorporated into code-compliant future development, and the existing or improved infrastructure that would be available to serve future development would help reduce or avoid spillover effects upon the natural environment.

The current use of the subject property is a church with an adjoining residence and vacant side yard, and nearby properties are either single-family residential (toward the north, east and south) or multifamily residential and commercial (toward the west) in nature. Due to its proximity or adjacency to small-scaled multifamily buildings and commercial uses along the major California Avenue SW arterial across the alley to the west, this property's built environment context is transitional, in that it is near and exposed to heightened activity levels on streets, alleys and private properties, and therefore less homogeneous than other typical Seattle areas located within the Single Family designation.

In such an area, the potential for newly enabled low-density multifamily residential development on the subject property would add an increment of adverse impact potential due to increased proximity of slightly denser residential development, but would not otherwise create whole new kinds of impacts upon its neighboring properties. The extent of potential future development would likely consist of up to approximately six townhouses. These factors support a conclusion that the potential range of land use-development-related built environmental impacts that could arise as a result of the recommended designation change would not be significant and adverse in magnitude. Also, no indirect or cumulative impacts are identified.

#### ITEM D – Lake City Land Use Designation Changes

#### NATURAL ENVIRONMENT AND BUILT ENVIRONMENT

The proposal could accommodate future rezone to commercial or mixed use zones such as Neighborhood Commercial. If future development were to occur at a greater intensity, the likely kinds of adverse natural environmental consequences would be an increased likelihood, and slightly greater potential magnitude, of soils disturbance in a greater area, possible changes in local stormwater surface drainage patterns, creation of dust, and generation of noise. All of these construction-related impacts could temporarily disturb nearby residents.

The affected properties are relatively level in topography, with minor slopes down toward the south. After construction, the increase in potential for natural environmental impacts due to future land use and development would be relatively minor, due to the nature of the probable uses (residential, retail, office), the features incorporated into code-compliant future development, and the infrastructure that would be available to serve future development would help reduce or avoid spillover effects upon the natural environment. Factors that might increase the potential for adverse impacts to the natural environment include: the largest property, which is potentially redevelopable and 2-3 acres in size, is located within a few hundred feet of a natural stream that is toward the southwest across city streets and within other properties. Depending upon the intensity and type of future potential development, different types of potential pollutants in stormwater runoff toward the natural drainage may be possible. For example, commercial businesses using or storing trucks in outdoor yards might generate different potential pollutant profiles than residential development. However, future development would be subject to the requirements of drainage and sewer codes that are stringent enough that they tend to result in better protections against runoff impacts than existing development. This would be expected to help avoid the potential for worst-case drainage and water quality impacts

such as uncontrolled surface runoffs from impervious surfaces on the property to nearby drainages and streams. Other properties also might or might not be redeveloped in the future, but they would also be subject to the same drainage and sewer requirements if new development occurs.

The potential for adverse impacts to the built environment is relatively minor as well. The subject area is already located within the Lake City Residential Urban Village; properties are zoned Lowrise 2, 3 and Midrise. Existing uses include a church, an office use residing in a former school building (in a Lowrise zone), three existing multifamily structures, and one other office building (in a Midrise zone). According to the City's quantitative factors for assessing redevelopment potential, none of these properties would likely meet criteria to be considered likely to redevelop under current zoning. That would mean there is no predicted likelihood for future redevelopment impacts.

However, based on a more liberal interpretation of building age and quality and property size, with a hypothetical future rezone there could be potential for long-term redevelopment of the large 2-3 acre property, potentially the 29,550 square foot church property, and perhaps one other office and one other multifamily property. Such redevelopment could thus contribute to greater future density and intensity of use of the subject properties, and generate a minor potential for adverse impacts to the built environment. This vicinity, though, is already characterized primarily by a mix of commercial uses, low-to-moderate density multifamily uses, and institutional uses such as parks and a library. The NE 125<sup>th</sup> Street arterial runs through the vicinity, and the Lake City urban village core is nearby to the east. This creates a built environment that is somewhat less sensitive to adverse impacts such as those related to increased building bulk and scale or potential non-residential uses. The presence of Virgil Flaim Park immediately to the south of the largest property also provides a buffer between potential future development and existing lower density development toward the south.

Increased traffic volumes and noise generation also could occur over the long-term, with potential for incremental additions of minor adverse effects on local streets to the north and south, and nearby existing residents in single family homes and multifamily homes (also in Lowrise zones). Traffic impact potential would be limited somewhat by the adjacency to NE 125<sup>th</sup> Street, which would be able to handle much of the inbound and outbound traffic additions if future denser development occurred.

In sum, the nature of the existing built environment, existing uses on the subject properties, and the relatively modest potential for future redevelopment would help to avoid the potential for significant adverse impacts to the built environment that might arise if future development occurs. Also, no indirect or cumulative impacts are identified.

#### ITEM E – Environmentally Critical Area Policy Amendments

#### NATURAL ENVIRONMENT AND BUILT ENVIRONMENT

The recommended revisions would provide improved and clarified policy support for the City's environmentally critical area protections, in some cases generalizing the language and in other cases better identifying purposes or the focus of the policies. The practical effect of the revisions would be to reinforce and better specify the meaning of the policy intents, which may aid in future evaluation of a wide variety of individual private or public actions. The expected range of physical outcomes in the natural environment, to the extent that they might be directly affected "in the field" would be a continued and probable improvement in the application of critical area regulations to places and situations where they might be affected by potential changes. For example, policy language will be available to help interpret a best course of action among possible choices by staff in how a geologically or hydrologically sensitive area may be protected. These probable contributions toward improved permitting/review outcomes would likely lead to long-term incremental positive impacts upon the environment.

The City already has regulations for peat-settlement prone areas, with no regulatory changes expected as a result of this proposed revision. Accordingly, no net changes in overall treatment or substantive adverse natural- or built-environment impact potential is identified for this item. Similarly, no adverse natural- or built-environment impact potential is identified for the recommended identification of seismic and volcanic hazard areas.

As a whole, the revisions are not likely to generate adverse impacts upon the built environment, including with respect to indirect or cumulative impacts. The environmentally critical areas policies and regulations would continue to be relevant to the same or nearly the same affected areas, which are broadly considered areas sensitive to future changes often in the form of development actions or other land alterations. By continuing and clarifying such protections, the likely outcomes would assist in maintaining public health and safety by avoiding potential degrading or damage to such resources, as well as supporting a trend toward improved overall protection of natural environments. No outcomes that would be construed as significant adverse impacts upon the built environment are identified.

# <u>ITEM F – Amendments to Environment Element Policies Addressing Stormwater</u> <u>Drainage Management and Permeable Surfaces</u>

#### NATURAL ENVIRONMENT AND BUILT ENVIRONMENT

The proposed text revisions to Policy EP8.1 provide somewhat more specific references to possible components (trees, vegetation, amended soil, and other low impact development techniques) that could be used where feasible. This replaces and expands upon terms such as "natural drainage system approaches." The other edits clarify and broaden the explanation of purposes. Such clarifications may assist in interpreting or adjusting future direction of departmental efforts, and/or may merely provide clarity and support for future activities. Given that the intent and probable effect of the changes would be to support long-term improved conditions through future stormwater management and environmental restoration efforts, the

EP8.1 amendment proposal is likely to avoid generating significant adverse natural environmental impact potential, including with respect to indirect or cumulative impacts.

The proposed text revisions to EP10 would remove a few clauses addressing policy purposes, including actions to increase vegetative cover for temperature, control stormwater flows and reduce pollution. The simplified proposed policy would encourage removal of unnecessary impervious surfaces. The revised policy essentially retains the focus on promoting actions that reduce runoff and its damaging effects, and that support increased ability for rain water to infiltrate into places close to where they reach the surface. This sort of streamlining of details in language does not lead to any probable concern that significant adverse natural environmental impacts could result. The deleted objectives may still remain as City department planning objectives in any affected program regardless of their presence or absence in this particular policy, and in fact are represented within a range of other policy documents – such as those that address tree protections and climate management for example.

#### ITEM G – Amendments to SMC 23.52.004

Technical amendments to this section of the Land Use Code are made to delete out-of-date information, update maps showing the location of screenlines and recognize that the LOS volume to capacity methodology is in an associated Director's Rule. No impacts are anticipated by adoption of these amendments.

#### **DECISION**

[X]	signi	rmination of Non-Significance. This proposal has been determined to not have a ficant adverse impact upon the environment. An EIS is not required under RCW IC.030.(2)(c).	
[ ]		Determination of Significance. This proposal has or may have a significant adverse mpact upon the environment. An EIS is required under RCW 43.21C.030(2)(c).	
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